

Defendant.

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

3. The Parties added Paragraphs 15 to 18 to address the non-waiver and claw-back of inadvertently produced privileged documents, the return of inadvertently disclosed materials, the rights of the parties to contest the production of documents and/or assert privileges in light of

the protective order, and to address the Family Educational Rights and Privacy Act and the Health Insurance Portability and Accountability Act of 1996, to the extent those laws are implicated in the production of documents in this action.

4. No memorandum of law in support of this motion is necessary because the relief requested lies within the Court's sound discretion. See LR 7.1(a)(2).

5. Both parties assent to the relief sought herein. See L.R. 7.1(c).

WHEREFORE, the Parties respectfully request that the Court issue an order:

- A. To grant their motion to approve the Protective Order; and
- B. To grant such other and further relief as this Court deems just and proper.

Dated: February 3, 2017

Respectfully submitted,

ST. PAUL'S SCHOOL,

By their attorneys,

McLANE MIDDLETON,  
PROFESSIONAL ASSOCIATION

/s/ Benjamin B. Folsom

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and

ALEXANDER AND SUSAN PROUT, as parents,  
next friends, and legal guardians of F.P., a minor

By their attorneys,

/s/ Charles G. Douglas

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**Certificate of Service**

I hereby certify that a copy of the foregoing has been forwarded this 3rd day of February, 2017 via the Court's ECF filing system to all counsel of record.

/s/ Benjamin B. Folsom